From:	Okorn, Barbara
To:	Ryan A. Johnson
Cc:	Frost, Mack (FHWA); Nash, Melissa A CIV USARMY CENAO (US); Kubico, Stephanie
Subject:	Nimmo Parkway Phase Vii-B Environmental Assessment Scoping
Date:	Wednesday, April 17, 2019 8:36:47 AM

Mr. Johnson,

EPA has reviewed your March 5, 2019 letter regarding the Environmental Assessment (EA) for the proposed Nimmo Parkway Phase VII-B project located in Virginia Beach, Virginia. The purpose of the proposed project is to provide improvements that would address issues with connectivity and reliable access for the Sandbridge community and reduce continued dependence on high-security Naval Air Station Oceana-Dam Neck Annex as a means of emergency egress for the Sandbridge Community. We understand that the study is being done in compliance with the National Environmental Policy Act (NEPA) and CEQ regulations implementing NEPA. Please find below recommendations for the scope of analysis for the proposed study.

- The NEPA document should include a clear and robust justification of the underlying purpose and need for the proposed action. The purpose and need statement is important because it helps explain why the proposed action is being undertaken and what objectives the project intends to achieve. The purpose of the proposed action is typically the specific objective of the activity. The need should explain the underlying problem for why the project is necessary. The alternatives are developed in response to the purpose and need.
- Alternatives analysis should include the suite of other activities or solutions that were considered and the rationale for not carrying these alternatives forward for detailed study. Information should be provided that describes the criteria against which alternatives were evaluated, such as environmental impacts, physical constraints, existing ROWs, cost, etc.
- The document should describe potential impacts to the natural and human environment. Existing resources should be identified and EPA encourages that adverse impacts to natural resources, especially wetlands and other aquatic resources, be avoided and minimized. Avoidance and minimization measures, such as bridging stream resources and using retaining walls, should be evaluated and documented in the NEPA document. Given the known flooding issues in the area, the NEPA document should clearly explain how the proposal mitigates for additional risk of flooding. EPA recommends information be provided that addresses how the design plan accounts for current and projected (pre- and post-construction) hydrologic regime and how it may be impacted by the proposed project. Avoidance and minimization measures should also specifically be considered for the existing cypress swamp near Ashville Bridge Creek. It should be clearly noted in the NEPA document how shading from the bridge is

considered in the total proposed impacts, as well.

- A robust narrative describing aquatic resources and functions should be included. We suggest at a minimum, a narrative should be provided that includes: a discussion of hydrology, including sources and direction of flow; the vegetative communities in the impact area, including size of trees (dbh), percent canopy cover, understory and other components such as woody debris and snags, and presence of invasive species; soil type(s); and an assessment of expected functions based on the HGM type, ecological community, 303(d) listings, and surrounding land-use. Specifically, additional qualitative information should be provided regarding the known cypress swamp, which EPA recommends avoiding in the proposed design plan due to the uniqueness and difficulty in replacing these habitats. Photos should be included. It is recommended that stream and waterbody buffers be preserved or enhanced. This information should be used to help identify and target avoidance and minimization opportunities, ensuring that the highest value resources are avoided in the project design. We would be pleased to coordinate with the project team and the U.S. Army Corps of Engineers on this work. Some information on resources may be gained from public websites including:
    - EnviroMapper[1]: https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system
    - Envirofacts[2]: https://www3.epa.gov/enviro/
    - NEPAssist[3]: https://www.epa.gov/nepa/nepassist
    - 303(d) Listed Impaired Waters: https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters
- Stormwater ponds, best management practices (BMPs) and construction staging areas should not be located in wetlands and streams. Stormwater management alternatives that address the existing and new construction should be considered and are encouraged. Additional information may be found at: the International Stormwater BMP Database: http://www.bmpdatabase.org.
- EPA suggests coordinating with other appropriate federal, state and local resource agencies on possible impacts to wetlands, streams, historic resources and/or rare, threatened and endangered species.
- An evaluation of air quality and community impacts, including noise, light and possible traffic impacts, should be included in the document. General conformity status should be included in the document. Executive Order 13405 Protection of Children's Health EO should be considered.
- The NEPA document should include an analysis of any hazardous sites or materials, and the status of any ongoing or past remediation efforts in the project area. This includes any groundwater contamination.
- We recommend the document include consideration of extreme weather events in particular in association with resiliency design.
- The document should address potential indirect and cumulative effects in the project areas; analysis may aid in the identification of resources that are likely to be adversely affected by multiple projects, and sensitive resources that could require additional avoidance or mitigation measures. It is suggested that a secondary and cumulative effects analysis begin with defining the geographic and temporal limits of the study; this is generally broader than the study area of the project. The cumulative impact analysis should evaluate impacts to environmental resources that have the potential to be impacted by the project (i.e. wetlands, surface water, etc).
- Mitigation should be discussed in the NEPA document. It should be noted that additional

mitigation may be required for any unavoidable impacts to the existing cypress swamp, or other special aquatic resources, in the project area to offset the loss of functions these unique and difficult to replace resources provide the aquatic ecosystem.

Thank you for coordinating with EPA on this project. We look forward to working with you as more information becomes available. We encourage the project team to consider other ongoing and proposed transportation projects in the vicinity in this analysis and possibly evaluating the need for a larger study that encompasses all of these projects. Please let me know if you have any questions on the recommended topics above.

1 The Watershed Assessment, Tracking & Environmental Results System (WATERS) unites water quality information previously available only from several independent and unconnected databases
2 Includes enforcement and compliance information
3 NEPAssist is a tool that facilitates the environmental review process and project planning in relation to environmental considerations. The web-based application draws environmental data dynamically from EPA Geographic Information System databases and web services and provides immediate screening of environmental assessment indicators for a user-defined area of interest. These features contribute to a streamlined review process that potentially raises important environmental issues at the earlier stages of project development.

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